

To the Commission:

As a member of the amateur radio community, I would only further like to mention that the Part 15 Device Community (IEEE 802, License-Exempt Alliance, et al.) frequently derives its technological benefits, directly or indirectly, from amateur radio technological developments. Accordingly, it seems many of the Part 15 Device Community's comments aimed at "safe harbors" and technical exemptions are counterproductive. The proposed rules and regulations in this proceeding are in the public interest, because those allow amateur radio to explore the expansion of the state of the art. The Part 15 Device Community would die without these innovations.

Finally, we are, after all, speaking about a rulemaking under Part 97 of the Commission's rules. There already are Part 15 rules. If the Part 15 Device Community wishes to explore technical exemptions, safe harbors, etc., within the frequencies that are designated for amateur radio operations, it seems more proper for the Part 15 Devices Community to initiate and prosecute their own rulemaking proceedings to that end, so that the amateur radio community can more properly address their concerns during the period for commenting on those rulemaking proceedings. Moreover, I am certain there are radio services with whom the amateur radio service shares frequencies which would wish to also comment on any of these proposed exemptions and safe-harbors. Therefore, the ideas of the Part 15 Device Community seem out of place in any context other than their own rulemaking.

These are just the musings of a sole individual, so I pray the Commission will take those in the spirit that I truly believe in my 21 years as a radio amateur that we can all share these frequencies harmoniously. The comments of the radio amateurs I have read tend to support this both in law, fact, and technology. Unfortunately, I have detected a tenor of bitterness in the Part 15 Device Community which overlooks the fact that those device-makers and device-users often enjoy their equipment because the radio amateur helped in its creation! Consequently, should the Part 15 Device Community wish to explore things that have been suggested thus far, I pray the Commission will deny their present requests with the recommendation that the Part 15 Device Community initiate its own rulemaking proceedings. Further, I pray the Commission grant the present rulemaking on behalf of the amateur radio and amateur satellite services. To these ends, I am...

Most respectfully yours,

/s./ James E. Whedbee  
James Edwin Whedbee, N0ECN